	<p>Surrey Heath Borough Council</p> <p>Pre-Submission Surrey Heath Local Plan (2019 – 2038) : (Regulation 19)</p> <p>Representation Form</p>	<p>Ref:</p> <p>(For official use only)</p>
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Please return to: planning.consultation@surreyheath.gov.uk
OR
Planning Policy and Conservation, Surrey Heath Borough Council,
Surrey Heath House, Knoll Road, Camberley, Surrey GU15 3HD.

By 12.00 noon 20th September 2024 NO LATE REPRESENTATIONS WILL BE ACCEPTED

This form has two parts:
Part A – Personal Details
Part B – Your representation(s). (Please be aware that this together with your name will be made publicly available)
Please fill in a separate sheet for each representation you wish to make.

Surrey Heath Borough Council's Privacy Statement is [here](#).

Please read the separate guidance notes before completing this form.

Part A

1. Personal Details*		2. Agent's Details (if applicable)	
Title		Mr	
First Name		Ben	
Last Name		Tattersall	
Job Title (where relevant)		Senior Planner MRTPI	
Organisation (where relevant)	UCB	Savills	
Address Line 1		33 Margaret Street	
Line 2		London	
Line 3			
Post Code		W1G 0JD	
Telephone Number		[REDACTED]	
E-mail Address		[REDACTED]	

Do you wish to be notified of when any of the following occurs? (place an X in the box to indicate which applies)

	Yes	No
• The Pre-Submission Local Plan has been submitted to the Secretary of State for independent examination?	X	
• The independent examiner's recommendations are published?	X	
• The Local Plan has been adopted?	X	

Please note that your formal comments (known as representations) and your name will be made available on the Council's website. All other details in Part A of this form containing your personal details will not be shown.

The Council cannot accept confidential comments as all representations must be publicly available.

Part B – Please use a separate sheet for each representation

Your representation should cover all the evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations following this publication stage.

After this stage, further submission will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Name or Organisation :	UCB
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3. To which part of the Pre-Submission Local Plan does this representation relate?

Paragraph		Policy		Other, e.g. policies map, table, appendix	<ul style="list-style-type: none"> - Policy ER2 (Strategic Employment Sites) - Policy IN1 (Infrastructure Delivery) - Policy IN2 (Transportation) - Policy GBC1 (Development of New Buildings in the Green Belt) - Policy GBC2 (Development of Existing Buildings in the Green Belt)
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4. Do you consider the Pre-Submission Local Plan is? (place an X in the box to indicate which applies)

4.(1) Legally compliant (please refer to guidance notes)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound (please refer to guidance notes)	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(3) Complies with the Duty to Co-operate (please refer to guidance notes)	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

5. Please give details of why you consider the Pre-Submission Local Plan is not legally compliant or does not meet the tests of soundness or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Pre-Submission Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments. You are advised to read our Representations Guidance note for more information on legal compliance and soundness.

It is considered that the Pre-Submission Local Plan is largely sound however it is requested that the Pre-Submission Local Plan is reviewed and revised following the current consultation and publication of the new NPPF due to conclude consultation in September 2024 to ensure that the Local Plan is consistent with National Policy.

Please see accompanying letter for further details of our representations.

6. Please set out what modification(s) you consider necessary to make the Pre-Submission Local Plan legally compliant and sound, having regard to the matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination) You will need to say why each modification will make the Pre-Submission Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

It is requested the Council review the wording of Policy GBC1 and GBC2 to ensure the policy wording aligns with the proposed reforms to the NPPF following the current consultation due to end in September 2024, including the introduction of the 'grey belt' definition. This will further support future appropriate development in the green belt to meet the Government's objective to bolster the delivery of new homes and grow the economy, with the latter being of particular relevance to UCB who form a key stakeholder in the local and regional R&D sector. This will ensure that the draft Local Plan is consistent with both adopted and emerging national policy, a key test for the soundness of a Local Plan.

With the proposed changes to the standard method for calculating housing need also being proposed under new planning reforms, which result in Surrey Heath's emerging Local Plan needing to plan for significantly higher housing need than calculated under the current standard method, it is considered that the proposed changes to the standard method for calculating housing need will need to be considered alongside proposed reforms to the NPPF to ensure the local plan complies with the transitional arrangements for the proposed planning reforms and meets the tests of soundness, which includes being consistent with national policy.

Please see accompanying letter for further details of our representations.

Please note your representation should cover succinctly all the evidence and supporting information necessary to support/justify your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

After this stage, further submissions will be only at the request of the Planning Inspector, based on the matters and issues he/she identifies for examination.

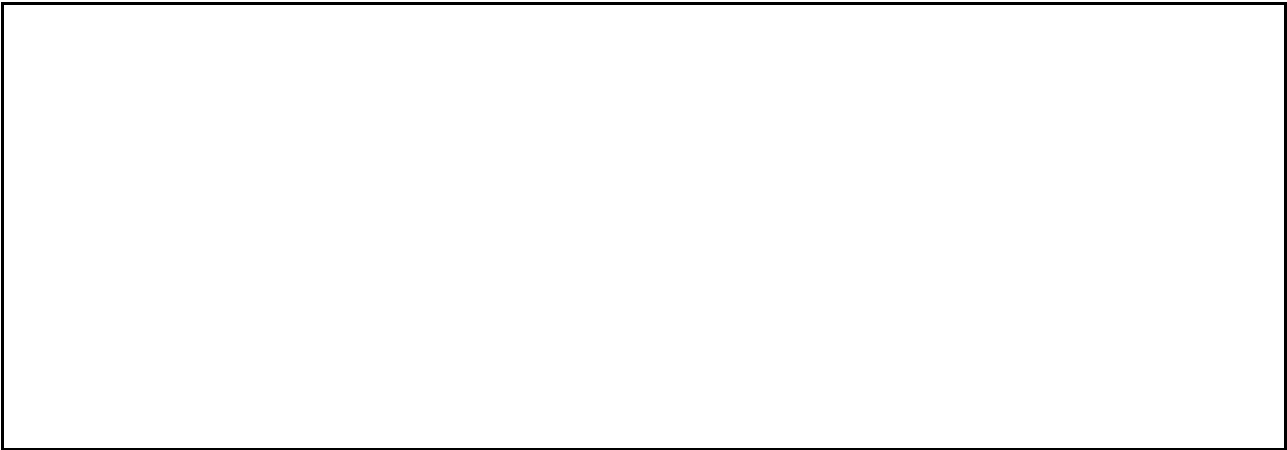
7. If your representation is seeking a modification to the Pre-Submission Local Plan, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

Please note - whilst this will provide an initial indication of your wish to participate in the examination, you may be asked at a later point to confirm your request to participate.

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:



Please note - the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination. You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

22 August 2024



Planning Policy and Conservation
Surrey Heath Borough Council
Surrey Heath House
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Dear Sir/Madam,

REPRESENTATION ON BEHALF OF UCB IN RELATION TO SURREY HEATH BOROUGH COUNCIL'S PRE-SUBMISSION SURREY HEATH LOCAL PLAN (2019-2038): (REGULATION 19)

We are instructed by UCB to submit representations to the Pre-Submission Surrey Heath Local Plan (2019-2038) (Regulation 19), which is subject to public consultation until Friday 20 September 2024. This letter builds on our previous representations to the 'Preferred Options' consultation and provides background and contextual information about UCB, before setting out our client's representations.

Background and Context

UCB is a global biopharmaceutical company and a world-leader in Life Sciences research. UCB plays a pivotal role in drug discovery and development, focused particularly on neurology and immunology. Exemplary of their contribution to Life Sciences, UCB in the UK developed treatments for plaque psoriasis, rheumatoid arthritis, ankylosing spondylitis, axial spondyloarthritis, psoriatic arthritis, osteoporosis and Crohn's disease. Research is ongoing to deliver potential treatments for patients suffering from severe diseases like Alzheimer's disease, Parkinson's disease and Amyotrophic Lateral Sclerosis.

Established in over 40 countries worldwide, UCB is in the process of relocating to Surrey Heath through significant investment in the Windlesham Campus, also known as Erl Wood Manor ('the Site'), to transform it into one of the company's three global research hubs. Planning permission was granted for UCB's new campus on 25 January 2022 under planning reference 21/1122/FFU and construction has started on site and is progressing at the time of writing this letter.

The approved development will support UCB's core Life Sciences mission, by facilitating the establishment of UCB in Windlesham as their new UK Headquarters. The development will perform a key role in UCB's projected investment (more than £1 billion over five years) in the UK and in supporting high value jobs in scientific research, translational medicine, clinical development, early manufacturing and commercial roles. UCB's new Windlesham headquarters therefore represent a significant asset for the Borough and implies a major injection of direct investment, economic activity and employment opportunities in the local area.

Representations

This next section sets out our representations to the Pre-Submission Surrey Heath Local Plan (2019-2038) (Regulation 19). Responses are provided, using the same chapter and policy numbering as the draft plan.

Within the draft Local Plan, the site is referred to as 'Erl Wood, Windlesham.' It is requested that the site is referred to as 'UCB Windlesham Campus' to reflect UCB's occupation of the site and to ensure consistency throughout the Local Plan document and policies map with how the site is known now that UCB occupy this significant strategic employment site.

Section 4: Town Centres, Retail and Economy

Policy ER2 (Strategic Employment Sites)

UCB welcomes the inclusion of Erl Wood, Windlesham as a Strategic Employment Site (as shown in the draft policies map) under Policy ER2 which affords the highest protection for Employment Uses on the Site and supports redevelopment and regeneration to provide floorspace for Employment Uses which primarily relate to Office, Research and Development, Light Industrial and General Industrial (Eg(i), Eg(ii), Eg(iii) and B2) land uses.

Paragraph 87 of the National Planning Policy Framework (Dec 2023) states that planning policies and decisions should recognise and address the specific locational requirements of different sectors, including making the provision for clusters or networks of knowledge and data-driven, creative or high technology industries. The proposed reforms to the NPPF seek to vary the wording of Paragraph 87 (now Paragraph 85 under the new draft NPPF) to make more explicit reference to planning policies and decisions making provision for new, expanded or upgraded facilities and infrastructure that are needed to support the growth of the knowledge, data-driven and high technology industries.

The inclusion of Erl Wood, Windlesham as a strategic employment site is consistent with both adopted and emerging national planning policy, supporting new, expanded and upgraded facilities for UCB, a key stakeholder in a high growth sector of the economy. The allocation provides formal recognition of the significant role of the Site in supporting Research and Development (R&D) and related business investment and job creation in this sector. The allocation responds to the significant investment UCB has already made in the establishment of their UK Headquarters in Windlesham and offers a supportive position for their ongoing investment in the Campus into the future. The importance of this employment allocation is emphasised in light of the Site being situated in the Green Belt, as referred to in Paragraph 4.64 of the draft Local Plan (Page 128).

UCB also welcomes the inclusion of Paragraph 3 under Policy ER2 which sets out support for small-scale proposals for changes of use or redevelopment to non-Employment Uses where these uses would provide complementary use(s) that are not detrimental to the function and operation of the Strategic Employment Site. This was raised in previous representations submitted by UCB who welcome the introduction of Policy support for appropriate non-employment uses on strategic employment sites. This is consistent with Paragraph 82(d) of the NPPF which sets out that planning policies should be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices, and to enable a rapid response to changes in economic circumstances.

Draft Plan Paragraph 4.67 provides examples of acceptable non-employment complementary uses which include cafés and sandwich bars that would cater for breakfast and lunchtime trade and creches to provide childcare for employees (provided that the creche was ancillary to the primary use). Future potential development on the UCB Campus to enhance staff facilities and well-being may include development of a café, gym facilities, recreation facilities such as tennis courts or sport pitches and development of nature walks with areas for outdoor business meetings. It is encouraged that examples of non-employment uses to complement employment uses should not be restricted to solely cafés and creches and the policy should identify broader support for non-employment uses which form ancillary facilities which support staff well-being, flexible working practices and enhanced facilities to support the Site's primary employment use.

Section 5: Infrastructure

Policy IN1 (Infrastructure Delivery)

UCB supports Policy IN1 which sets out that development will be permitted if it can be demonstrated that there is, or will be, sufficient infrastructure capacity to support and meet the requirements arising from new development and where additional infrastructure capacity is required, this will be secured either through direct provision or financial contributions (Community Infrastructure Levy (CIL), or its replacement, and/or S106).

A notable challenge impacting Surrey Heath and the wider region is power supply, which is particularly acute for strategic employment sites where there are significant power requirements for employment uses, such as life science or manufacturing uses. Power demand also arises from ancillary infrastructure to support employment uses such as EV and cycle charging infrastructure to encourage a shift to sustainable travel modes. Demand for new infrastructure will not only result from new proposed developments, but also existing buildings and sites which are seeking to decarbonise away from gas systems to electric systems.

Therefore, the Local Plan must identify sufficient means to deliver infrastructure not only for the needs of new development, but also existing development where decarbonisation of existing building stock will continue to occur. Therefore, the Local Planning Authority must ensure infrastructure delivery is provided in partnership with relevant providers and ensures that expanded infrastructure is operational and readily available for both the needs of new development, as well as existing development.

As well as strategic delivery of infrastructure improvements, planning policy support should be given to smaller scale infrastructure improvements, such as installation of renewable energy sources on individual sites. It is considered that Policy DH8 (Building Emissions Standards) provides this policy support to ensure development positively contributes to addressing climate change through low/zero carbon design that improves the energy efficiency of both new and existing buildings and provides low or zero carbon energy. Potential on-site renewable energy generation at UCB Windlesham Campus could be installation of solar PVs to rooftops of buildings and/or installation of solar PVs over the existing multi-storey car-park. This would assist with providing on-site renewable energy generation, reducing reliance on the wider national grid where power supply is an acute issue impacting future developments on the site.

Policy IN2 (Transportation)

Policy IN2 (Transportation) sets out new development will be required to provide and/or fund the provision of suitable access and transport infrastructure and services that are necessary to make it acceptable, including the mitigation of otherwise unacceptable impacts on highway safety and/or any severe residual cumulative impacts on the road network. Similarly to Policy IN1, it is considered that this will be secured through direct provision or financial contributions (Community Infrastructure Levy (CIL), or its replacement, and/or S106).

UCB are eager for improvements to be made in public transport and cycle infrastructure in the local area to encourage employees and visitors to travel to the UCB Windlesham Campus via sustainable transport modes. Access to the Campus is currently poor and dangerous for cyclists and access from public transport could be improved given the distance of the site from local train stations. Significant cycle storage provision is being provided as part of planning reference 21/1122/FFU and the Local Planning Authority, in partnership with Surrey County Council, must ensure future developments in the local area contribute directly or via financial contribution to secure improvements to sustainable travel options, such as safe cycle routes and cycle lanes, to ensure on-site facilities being secured under planning permissions can be utilised to the fullest, maximising sustainable travel within the Borough and encouraging a modal shift away from private vehicles.

Section 7: Green Belt and Countryside

Policy GBC1 (Development of New Buildings in the Green Belt) and Policy GBC2 (Development of Existing Buildings in the Green Belt)

It is considered that Policy GBC1 and GBC2 are consistent with the adopted NPPF, aligning with the exceptions to inappropriate development in the Green Belt set out under Paragraph 154 of the NPPF and 'very special circumstances' set out under Paragraph 152 of the NPPF.

The proposed reforms to the NPPF, announced on 30 July 2024, is now a material consideration indicating the direction of travel of national planning policy, notably in regard to the need to increase the supply of new homes on both brownfield land and green belt land and realise the economic potential of key growth areas in the economy. The proposed reforms to the NPPF include the introduction of the 'grey belt' and sets out development which would utilise grey belt land in sustainable locations and does not fundamentally undermine



the function of the Green Belt across the area of the plan as a whole should not be regarded as inappropriate development. It is considered that the central Campus of Erl Wood Manor would constitute grey belt land, constituting previously developed land. This provides further policy support to enable development on the Site, expanding what can be considered appropriate development in the Green Belt.

It is requested the Council review the wording of Policy GBC1 and GBC2 to ensure the policy wording aligns with the proposed reforms to the NPPF following the current consultation due to end in September 2024, including the introduction of the 'grey belt' definition. This will further support future appropriate development in the green belt to meet the Government's objective to bolster the delivery of new homes and grow the economy, with the latter being of particular relevance to UCB who form a key stakeholder in the local and regional R&D sector. This will ensure that the draft Local Plan is consistent with both adopted and emerging national policy, a key test for the soundness of a Local Plan.

With the proposed changes to the standard method for calculating housing need also being proposed under new planning reforms, which result in Surrey Heath's emerging Local Plan needing to plan for significantly higher housing need than calculated under the current standard method, it is considered that the proposed changes to the standard method for calculating housing need will need to be considered alongside proposed reforms to the NPPF to ensure the local plan complies with the transitional arrangements for the proposed planning reforms and meets the tests of soundness, which includes being consistent with national policy

Conclusion

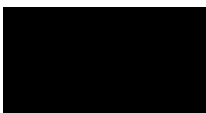
We are delighted to participate in the public consultation on the Pre-Submission Surrey Heath Local Plan (2019-2038): (Regulation 19) and to submit these representations on behalf of UCB. Our client will make a significant contribution to the local economy of the Borough and its role in the nation's R&D network. It is therefore of critical relevance that the Campus continues to be designated as a Strategic Employment Site within the new Local Plan, and accordingly the draft Local Plan is broadly supported on this basis.

It is encouraged that the draft local plan is revised in light of the proposed planning reforms announced by the Government on 30 July to ensure the plan meets the tests of soundness, including being consistent with national policy.

Please would you acknowledge receipt of this representation. We reserve the right to supplement this representation.

Please contact either myself or Emma Andrews ([REDACTED]) should you have any queries.

Yours faithfully



**Ben Tattersall
Senior Planner**